

November 24, 2020

Hon. Laura Taylor Swain
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl St.
New York, N.Y. 10007

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Re: *TECO Guatemala Holdings, LLC v. Republic of Guatemala*
Case No. 20-cv-09559 (LTS)

Dear Judge Swain:

We represent Petitioner TECO Guatemala Holdings, LLC (“TGH”) in the above-captioned matter. Together with counsel for Respondent Republic of Guatemala (“Guatemala”), we respectfully submit this joint letter requesting an adjournment of the parties’ briefing schedule as it relates to the pending emergency motion to vacate the restraining notice issued by TGH (the “Motion”). *See* ECF Nos. 2-3.

An extension is necessary because – in accordance with Your Honor’s November 16, 2020 Order, ECF No. 11 – the parties have been working towards consensually resolving the issues in dispute. The parties therefore respectfully request that the briefing schedule ordered by Your Honor be adjusted as follows: TGH’s opposition to the Motion shall be due on Monday, November 30, 2020, and Guatemala’s reply in support of the Motion shall be due on Wednesday, December 2, 2020.

Pursuant to Rule 1.f of Your Honor’s Individual Practices, the parties provide the following information:

- 1) TGH’s opposition to the Motion is currently due on Wednesday, November 25, 2020. Guatemala’s reply in support of the Motion is currently due on Wednesday, December 2, 2020.
- 2) No previous extension or adjournment has been sought.
- 3) N/A.
- 4) The parties make this letter motion jointly and consent to the requests herein.

We appreciate the Court’s attention to this matter and the parties are available at the Court’s convenience to answer any questions.

Hon. Laura T. Swain
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Respectfully submitted,

/s/ Gregory M. Starner

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